

THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

DADRIE A. MATTHIS, a single person

No.

Plaintiff,

COMPLAINT FOR NEGLIGENCE

v.

SAFEWAY INC. (Store location 9262
Rainer Ave. So, Sea. King County, WA)

Defendants.

COMPLAINT

COMES NOW the Plaintiff, Dadrie Matthis by counsel, and for her Complaint
against the Defendant(s), Safeway Inc. alleges and states:

I. THE PARTIES

1.1. The Plaintiff, Dadrie Matthis (hereinafter referred to as Ms. Matthis), is
an adult citizen of King County, State of Washington, and resides in Seattle.

1.2. The Defendant, Safeway, Inc., (hereinafter referred to as Defendant), is a corporation
incorporated under the laws of the State of Washington whose principal place of business
is at 11555 Dublin Canyon Road, Pleasanton, WA. 94588-2815 and is subject to service
of process by and through its registered agent: CT Corporation System, 711 Capitol Way,
Ste. 204, Olympia, WA. 98501-1267

II. THE FACTS

2.1. On November 12, 2018 Ms. Matthis and her two grandchildren entered defendant's place of business to purchase gas.

2.2. Ms. Matthis walked with her grandchildren into the pay station to pay for her gas.

2.3. As she exited the store to go back to her car and pump gas she slipped on foreign oily substance on the ground.

2.4. Ms. Matthis was in immediate pain and remained on the concrete ground until Medic arrived.

2.5. Ms. Matthis heard paramedic personnel told Safeway employee to get 'Kitty Litter' to put on the ground.

2.6. Her grandchildren were scared and frightened from the ordeal.

2.7. Ms. Matthis was transported to Harbor Medical Center for treatment.

2.8. Ms. Matthis was a business invitee at Defendant's store.

2.9. The Defendant had actual or constructive notice that the said oily substance was creating a hazardous and/or dangerous condition.

2.10. The Defendant did not take any steps reasonably calculated to fix or repair the aforesaid dangerous and hazardous condition.

2.11. The Defendant did not post any signs or other devices warning persons of the dangerous and hazardous condition.

2.12 The Defendant failed to keep the area reasonably safe to the public.

III. THE CLAIMS

3.1 Defendant has a duty to maintain its business premises in a reasonably safe

1 condition, a duty to take steps reasonably calculated to remove the aforesaid hazardous and
2 dangerous condition, and a duty to warn its business invitees of the aforesaid dangerous and
3 hazardous condition.

4 3.2. The Defendant breached its duties delineated hereinabove proximately
5 causing Ms. Matthis to suffer the following damages:
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- 7 a) Severe and permanent personal injuries.
8 b) Past, present and future pain and suffering.
9 c) Past, present and future mental anguish.
10 d) Temporary and/or permanent disability.
11 e) Disfigurement; past,
12 f) Present and future medical expenses and costs.
13 g) Past and present lost wages; lost wage-earning capacity.
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16 IV. DEMAND FOR RELIEF

17 The Plaintiff prays for the following relief:

- 18 4.1 Trial by jury.
19 4.2 Judgment for Plaintiff and against the Defendant.
20 4.3 An award of damages which will fully and fairly compensate Plaintiff for severe
21 and permanent personal injuries; past, present and future pain and suffering; past,
22 present and future mental anguish; temporary and/or permanent disability;
23 disfigurement; past, present and future medical expenses and costs; past and
24 present lost wages; lost wage-earning capacity; property damage.
25 4.4 Such other and further relief deemed just and proper in the premises.
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27 DATED this 5th day of October 2021
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CONNELL LAW OFFICE, LLC

S/s Raymond A. Connell

Raymond A. Connell, WSBA No. 16119
Attorney for Plaintiff